UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

ANGELO LOMBARDO,

Plaintiff.

CIVIL ACTION NO. 02-CV-2960

ν.

LOCKHEED MARTIN CORPORATION,

Defendant.

MOTION FOR ADMISSION PRO HAC VICE

Defendant, Lockheed Martin Corporation (hereinafter referred to as "Lockheed"), by and through its attorney, Christopher M. Farella, of the firm Epstein Becker & Green, P.C., hereby moves this Court for leave to allow Suzanne P. Sherman, of the firm of Epstein Becker & Green, P.C., Two Gateway Center, 12th Floor, Newark, New Jersey 07102, to appear and participate in this case, and in support thereof, avers the following:

- 1. I am admitted to and am in good standing with the Bar of the United States District Court for the Eastern District of Pennsylvania, the Commonwealth of Pennsylvania, the United States Supreme Court, the United States Court of Appeals for the Third Circuit, the State of New Jersey and the United States District Court for the District of New Jersey, the State of New York and the United States District Court for the Southern District of New York.
- 2. I hereby move to admit Suzanne P. Sherman to practice before this Court pro hac vice in the above-entitled action.
- 3. Ms. Sherman assists in representing Lockheed in several matters and is intimately familiar with the subject matter of the pending action. Lockheed desires Ms. Sherman to assist as counsel on its behalf in this case.

- 4. Ms. Sherman is a member in good standing of the Bar of the State of New Jersey and the United States District Court for the District of New Jersey, the State of New York and the United States District Courts for the Southern and Eastern Districts of New York.
 - 5. Plaintiff's counsel has consented to Ms. Sherman's admission.
- 6. Ms. Sherman is not now, nor has he ever been, the subject of disciplinary proceedings in any jurisdiction.
- 7. I am acquainted with Ms. Sherman and I can attest to her diligence, ethical standards, and willingness to abide by the Local Disciplinary Rules of the United States District Court for the Eastern District of Pennsylvania. If admitted to practice before this Court <u>pro hac vice</u>, Ms. Sherman will carry out her obligations ably and in accordance with the standards expected by this Court.

WHEREFORE, it is respectfully requested that this Court enter an order admitting Suzanne P. Sherman <u>pro hac vice</u> on behalf of defendant, Lockheed Martin Corporation.

EPSTEIN BECKER & GREEN, P.C.

Attorneys for Defendant

Lockheed Martin Corporation

D.

Christopher M. Farella Attorney I.D. No. 74189

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Dated: September 10, 2002